

**First Public Report
for the 2001 Triennial Review of the
Water Quality Control Plan for the North Coast Region
(Basin Plan)**

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**Prepared by

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I. INTRODUCTION

This report commences the 2001 Triennial Review of the *Water Quality Control Plan for the North Coast Region* (Basin Plan) and is intended to serve as a starting point for interested persons to provide input to the North Coast Regional Water Quality Control Board (Regional Water Board). The report contains a brief background of basin planning, a description of the Triennial Review process, the 2001 Triennial Review schedule, and a Regional Water Board staff assessment of the Basin Plan.

The staff assessment (beginning on page 4) is divided into two sections: the first section describes the status of 1998 Priority List water quality issues and the second section identifies new water quality issues for the Regional Water Board to consider in the 2001 Triennial Review.

Regional Water Board staff is presently soliciting suggestions and requests from the interested public regarding the need to update or revise any section of the Basin Plan. Regional Water Board staff will conduct public workshops during June 2001. Following the workshops, staff will review and summarize the input received in a second public report. The second public report will include a prioritized list of issues which will set the planning workload for the next three years. The issues will be prioritized based on criteria such as water quality protection, legal mandates, and accurate representation of laws and policies. The list of issues includes funded and unfunded priorities. Unfunded priorities will be identified and addressed if funding becomes available. The Regional Water Board has publicly noticed its Triennial Review of the Basin Plan and associated public workshops and final hearing.

II. BACKGROUND

Water quality control plans (basin plans) provide the basis for protecting water quality in California. Basin Plans are mandated by both the Federal Clean Water Act (CWA) and the State Porter-Cologne Water Quality Act (Porter-Cologne). Sections 13240-13247 of Porter-Cologne specify that the regional basin plans shall include the following:

- Past, present, and probable future beneficial uses of water
- Water quality objectives, which, in the judgment of the Regional Water Board, will ensure the reasonable protection of beneficial uses and the prevention of nuisance.
- The program of implementation for achieving water quality objectives, including a description of the nature of actions which are necessary to achieve the objectives, time schedules for the actions to be taken, and a description of surveillance to be undertaken to determine compliance with objectives.

The Regional Water Board adopted its first interim basin plans in 1971. These were followed in 1975 by a comprehensive *Water Quality Control Plan for the Klamath River Basin (1A)* and a comprehensive *Water Quality Control Plan for the North Coastal Basin (1B)*. In 1988, the Regional Water Board combined and updated the two comprehensive plans and their abstracts into a single *Water Quality Control Plan for the North Coast Region*. In 1993, the Regional Water Board again updated descriptions and corrected inaccuracies in the Basin Plan. The Regional Water Board has amended the Basin Plan numerous other times between 1975 and 1996.

III. THE TRIENNIAL REVIEW PROCESS

Section 13240 of Porter-Cologne and Section 303 (c)(1) of the CWA require a review of basin plans at least once each three-year period to keep pace with changes in regulations, new technologies, policies, and physical changes within the region. The Regional Water Board is responsible for this review, and is required to:

- 1) identify those portions of the Basin Plan which are in need of modification or new additions;
- 2) adopt standards as appropriate; and
- 3) recognize those portions of the Basin Plan which are appropriate as written.

The review includes public workshops to identify issues of water quality concern, which may be remedied by revision of the Basin Plan. After public input is received, the Regional Water Board's role in the Triennial Review process is to evaluate if Basin Plan revisions are needed, and to set forth a Priority List and schedule for consideration of the needed Basin Plan revisions.

At the conclusion of the Triennial Review, the Regional Water Board will adopt a resolution, which sets forth a prioritized list of potential revisions to the Basin Plan. Attachment 1 is Regional Water Board Resolution No. 98-113, which resulted from the Regional Water Board's last Triennial Review in 1998.

This report commences the 2001 review of the Basin Plan for the North Coast Region. This report is a Regional Water Board staff assessment of the adequacy and inadequacies of the Basin Plan as amended on May 23, 1996, and serves as a starting point for interested persons to provide input regarding the Basin Plan for the 2001 Triennial Review.

IV. 2001 TRIENNIAL REVIEW SCHEDULE

Attachment 2 contains the 2001 Triennial Review Schedule. This report is the first step in the 2001 Triennial Review.

The second step includes public workshops during which the Regional Water Board staff will receive recommendations for changes to the Basin Plan from the public. The public workshops are scheduled in Eureka on June 5, 2001, in Yreka on June 6, 2001, and in Santa Rosa on June 12, 2001.

Following the three public workshops, Regional Water Board staff will summarize and respond in a second public report to all input received during the workshops. Based on the input received, the second public report will also contain a proposed Priority List of potential Basin Plan amendments and a tentative work schedule to be considered by the Regional Water Board during fiscal years 2001-2002, 2002-2003 and 2003-2004. The second public report will be available by July 23, 2001.

The Regional Water Board will receive comments regarding the proposed Priority List during the period leading up to and at the public hearing scheduled in Santa Rosa on August 23, 2001. At that time, the Regional Water Board may adopt by resolution the proposed Priority List or a revised Priority List, or it may extend the public hearing for further consideration and adoption at a later date.

After the Priority List is adopted, the Regional Water Board will submit the Priority List, Resolution, and schedule, to the State Water Resources Control Board (State Water Board). The State Water Board will make the results of the Triennial Review available to the U.S. Environmental Protection Agency (USEPA) for approval.

The Priority List adopted by the Regional Water Board will direct the planning efforts of staff for the next three years. As staffing and budget allow, the Regional Water Board will consider each of the water quality issues identified on the Priority List for Basin Plan amendment. Subsequently, and separate from the Triennial Review process, the Regional Water Board will consider each proposed Basin Plan amendment using public hearings and the California Environmental Quality Act functional equivalent process. This will allow the Regional Water Board to consider each potential basin plan amendment on its own merits.

V. ASSESSMENT OF THE BASIN PLAN

The Basin Plan is a useful planning document and has remained relatively current to reflect changing needs through past updates. It was last updated on May 23, 1996. However, some sections of the Basin Plan have not been updated since it was first adopted in 1971. In addition, the current focus on watershed planning and Total Maximum Daily Load (TMDL) development may entail amendment of the Basin Plan during the next three years. This section of the report provides a Regional Water Board staff assessment of the current Basin Plan and identifies issues that have been raised by the public since adoption of the 1998 Triennial Review Priority List.

A. STATUS OF 1998 PRIORITY LIST OF WATER QUALITY ISSUES

During the 1998 Triennial Review, the Regional Water Board identified and prioritized a number of water quality control issues, which could result in amendment of the Basin Plan. That list, included in Attachment 1, also set forth an estimated schedule of work to be completed by fiscal year 2000. While no basin plan amendments were proposed following the 1998 Triennial Review, several areas of activity did ensue and some reviews were completed. No Basin Plan amendments occurred over the last 3 years, principally due to unfilled planning staff vacancies and re-direction of work efforts to other priorities.

The following summary identifies issues from the 1998 Triennial Review. Each issue concludes with a recommendation (in bold print) as to whether or not it should be continued to the 2001 Triennial Review.

ISSUE #1: DEVELOP A POLICY FOR THE REGULATION OF UNDERGROUND STORAGE TANKS SPECIFIC TO THE NORTH COAST REGION

On May 27, 1993, the Regional Water Board adopted Resolution No. 93-59, which incorporated an *Interim Policy on the Regulation of Waste Discharges from Underground Petroleum Storage Tank Systems* (Interim Policy) into the Basin Plan. The resolution was approved by the State Water Board and the State Office of Administrative Law and became effective on August 18, 1994. The Interim Policy was included on the Regional Water Board's 1995 Triennial Priority List on the basis of three activities that were occurring statewide with respect to leaking underground storage tanks:

1. State Water Board Resolution No. 92-49, *Policies and Procedures for Investigation and Cleanup and Abatement under Section 13304 of the Water Code*, was undergoing statewide hearings for revision to include a "containment zone policy" which applies to groundwater where attainment of water quality objectives cannot reasonably be achieved.
2. The Office of Statewide Consistency was conducting external reviews of each Regional Water Board's Underground Storage Tank (UST) program between August 1996 and February 1998.
3. A statewide petroleum policy to establish guidance for cleanup and closure of leaky UST sites was drafted and circulated for State Water Board and Regional Water Board comments.

Resolution No. 92-49 has been amended to include a "containment zone policy," the Office of Statewide Consistency has completed its review of Regional Water Board UST programs, and the proposed statewide petroleum policy is no longer under consideration.

Additional draft guidance has been proposed by the State Water Board to address the significant emerging pollution associated with the gasoline additive, methyl-tertiary-butyl ether (MtBE). Hearings on the draft guidance were not completed, and the draft guidance has not been formally adopted. However, the Regional Water Boards are implementing concepts from the draft guidance.

Staff comprehensively reviewed its Interim Policy on the Regulation of Waste Discharges from Underground Petroleum Storage Tank Systems (Resolution No. 93-59) during the last triennial review period. Staff determined that no specific modifications are required to address changes in laws, regulations, and policies. Modifications of the Basin Plan, if needed, to address MtBE should await completion of the statewide policy for this contaminant.

Staff recommends that this issue not be included in the 2001 Triennial Review.

ISSUE #2: REVIEW WATER QUALITY PROBLEMS IN THE KLAMATH, SCOTT, AND SHASTA RIVERS

Major planning efforts have been completed or are underway in these watersheds, including:

- 1. The development of a Watershed Management Plan for the Klamath River area.** This planning effort has resulted in a revision of the Watershed Management Initiative (WMI) planning chapter for the Klamath Watershed Management Area. The chapter was finalized in January 2000 and sets forth a Regional Water Board strategy for water quality protection and improvement.
- 2. Water Quality monitoring.** An intensive multi-agency monitoring effort began in March 1996 as part of a USEPA grant project and continues today. Data from the cooperative effort will be used in the Klamath Resource Information System (KRIS); an easily accessible database developed using CWA Section 319(h) grant funding. The product of this work effort will support Klamath resource programs and the development of Total Maximum Daily Load (TMDL) allocations by 2004 in the Klamath and by 2005 in the Scott and Shasta.
- 3. Administration of CWA Section 205(j) and Section 319(h) grants.** These grants support voluntary monitoring, planning, and nonpoint source pollution control efforts. The initial and primary goals of such efforts have been to lower water temperatures, reduce nutrient loading, and restore fisheries habitat.

TMDLs for the Klamath watershed will be developed by 2004 and for the Scott and Shasta by 2005. The TMDLs should substantially address the water quality issues in the watershed related to the 1998 303(d) list stressors. Therefore, this issue is being accomplished and need not remain on the Triennial Review List.

ISSUE #3: REVIEW THE POLICY ON THE CONTROL OF WATER QUALITY WITH RESPECT TO ON-SITE WASTE TREATMENT AND DISPOSAL PRACTICES

On May 23, 1996, the Regional Water Board adopted Resolution No. 96-16 Amending the *Water Quality Control Plan for the North Coast Region*, Section 4, Implementation Plans, Point Source Measures, Policy on the Control of Water Quality With Respect to On-site Waste Treatment and Disposal Systems. The amendment became effective after approval by the State Water Board and the State Office of Administrative Law on November 20, 1996. The policy is now in effect.

AB 885 (2000) requires the State Board to Adopt regulations/standards for onsite septic systems by January 1, 2004 that will:

1. Consider minimum operating requirements (including construction, siting and performance requirements).
2. Include requirements for onsite systems adjacent to impaired waters listed pursuant to 303(d) of the Clean Water Act.
3. Authorize a qualified local agency to implement the requirements developed by the SWRCB.
4. Provide that these regulations or standards shall apply, six months after adoption, to systems that are newly constructed, replaced, pooling to the surface or can impair the beneficial use of state waters or the public health.

The existing North Coast Basin Plan already addresses most of the issues contained in AB 885. Staff is participating in the statewide technical group that will provide compliance with the directives of AB 885. It would be appropriate to apply those statewide regulations/standards to updating the North Coast Basin Plan at that time.

Staff recommends extending this issue to the 2004 Triennial Review.

ISSUE #4:UPDATE THE POLICY ON THE DISPOSAL OF SOLID WASTES

There has been no staff effort to update this Policy since the 1995 Triennial Review. However, the issues brought up during the 1995 Triennial Review are still pertinent and are described as follows:

1. Assembly Bill 1220 created legislation that combined a portion of SWRCB Chapter 15 Title 23, CCR with a portion of the California Integrated Waste Management Board (CIWMB) Title 14, CCR regulations into a new set of Title 27, CCR State Solid Waste Management regulations. The Basin Plan does not describe the clarification and division of solid waste regulatory authority and responsibility between the CIWMB and the State Water Board which resulted from this legislation.
2. The Basin Plan does not include Order No. 93-83 adopted by the Regional Water Board on September 22, 1993 which implements applicable federal solid waste regulations set forth in RCRA Subtitle D for all municipal solid waste landfills.

The Basin Plan Policy on Disposal of Solid Wastes contains outdated references to the Solid Waste Assessment Testing program (SWAT) and is in need of update to reflect more recent legislative mandates.

Staff recommends this issue remain on the 2001 Triennial Review list.

ISSUE #5: CONSIDER REVISIONS TO THE WATER QUALITY OBJECTIVES FOR DISSOLVED OXYGEN AND TEMPERATURE

Regional Water Board staff has conducted literature searches on 1) optimal and tolerated dissolved oxygen and temperature levels and 2) standards in other regions of California and other states.

Temperature and dissolved oxygen parameters were first identified as being issues in a number of watersheds in the May 15, 1998 version of the North Coast Region's WMI Chapter. Additionally, a contract with the Sonoma County Water Agency will cause an evaluation of these parameters for compliance with a "no take" provision under the federal Endangered Species Act for listed salmonids in the Russian River watershed and is intended to result in proposals to amend the Basin Plan.

Because interest in this issue has increased in recent years and because the issue is pertinent to the development and implementation of TMDLs and watershed planning in the North Coast Region, staff recommends extending this issue to the 2001 Triennial Review.

ISSUE #6: CONSIDER SPECIFIC OBJECTIVES FOR NUTRIENTS

Due to vacancies, budget limitations, and higher priorities, little Regional Water Board staff effort has been expended to evaluate the issue of nutrients, such as phosphate, nitrate and similar parameters. Nutrients were first identified in the May 15, 1998 WMI Chapter as an issue in some watersheds. The USEPA is currently undertaking development of numeric nutrient criteria guidance applicable to lakes, streams, rivers, wetlands, estuaries and near coastal waters as protection against eutrophication and plans to have it completed by 2003. USEPA currently anticipates that states will adopt their criteria no later than 2004.

Staff is currently working with the SWRCB and USEPA in the development of numeric criteria. Staff recommends that this issue be addressed following EPA's adoption of numeric criteria guidance.

ISSUE #7: AMEND SECTION IV, IMPLEMENTATION PLANS, NONPOINT SOURCE MEASURES

Many planning actions have occurred to address non-point source pollutants since the Basin Plan was first adopted, but some areas may still require an update. For example, the Non-Point Source Action Plan for Logging, Construction, and Associated Activities has not been amended since it was first adopted, and revision to this section is discussed under Issue #12.

In 1995, the State Water Board initiated a statewide review of 11 areas with respect to nonpoint source pollution control: irrigated agriculture, nutrient application, pesticide application, timber harvesting, confined animal facilities, grazing, abandoned mines, urban runoff, hydro modification and wetlands, on-site sewage disposal systems, and boating and marinas.

The State Water Board accepted the recommendations of the review in January 1996, endorsed the recommendations as representing a reasonable course for improvements in pollution control. These recommendations are now key elements of the State Water Board's recently adopted Nonpoint Source Program Plan.

The Regional Water Board developed its Watershed Management Initiative (WMI) Chapter, which focuses all North Coast Region activities, including nonpoint source controls, on a watershed basis. Sediment discharges associated with road building, vineyards, and timber harvesting were identified as issues requiring actions.

One issue associated with sediment discharges involves the need for sound in-stream water quality information relating to turbidity and sedimentation. These monitoring needs are not currently addressed in the Basin Plan.

Staff recommends including this issue in the 2001 Triennial Review to address monitoring.

ISSUE #8: AMEND TABLE 2-1, BENEFICIAL USES

Chapter 2 of the Basin Plan defines beneficial water uses and identifies beneficial uses of specific and general waterbodies in Table 2-1. Recommendations have been made to revise Table 2-1. Staff is currently reviewing the proposed and existing beneficial uses in each hydrologic unit. The proposed changes that have been identified include:

1. Include the RARE beneficial use designation for all waterbodies having existing or potential threatened or endangered species habitat.
2. Include Wages Creek as a specific waterbody in the Mendocino Coast Hydrologic Unit. Staff have identified the following beneficial uses of Wages Creek: MUN, AGR, GWR, REC1, REC2, COLD, WARM, WILD, RARE, MIGR, SPWN, and EST.

3. Include the WARM beneficial use designation for the Laguna de Santa Rosa. The Laguna de Santa Rosa historically and presently supports a warm-water fishery. This beneficial use has been erroneously left out of this table.
4. Include the MUN beneficial use designation for freshwater streams in the Eureka Plain Hydrologic Unit, such as Jacoby Creek, Freshwater Creek, and the Elk River.

Table 2-1 does not include the MUN beneficial use for the freshwater streams tributary to Humboldt and Arcata Bays in the Eureka Plain Hydrologic Unit. Since these freshwater streams are not coastal streams (they drain to the bays, not the Pacific Ocean), they should be identified individually under the Eureka Plain Hydrologic Unit.

5. Change the Municipal (MUN) and Domestic (DOM) Supply designation from “Potential” to “Existing” for the Garcia River.
6. Add the existing Spawn (SPWN) and Migration (MIGR) beneficial uses to the Laguna de Santa Rosa.
7. Add wetlands as a beneficial use and add a description of freshwater and brackish wetlands to the Beneficial Use Section.

Staff recommends that this issue remain on the 2001 Triennial Review list. Updating the Beneficial Use Section of the Basin Plan is a high priority that staff has already initiated.

ISSUE #9: AMEND SECTION IV. IMPLEMENTATION PLANS TO INCLUDE TMDL IMPLEMENTATION STRATEGIES FOR 303(d) LISTED WATERBODIES

Under the Clean Water Act each state shall establish, for impaired waterbodies as listed on the 303(d) list, and in accordance with a priority ranking, the total maximum daily load (TMDL) for the pollutant of concern (33 USC §1313). In other words, for waterbodies on the 303(d) list, states, territories, and authorized tribes must develop TMDLs that will achieve water quality standards, allowing for seasonal variations and an appropriate margin of safety.

A technical support document, or TSD, is a report developed by Regional Water Board staff which meets all federal requirements for a TMDL, but with no implementation or monitoring plan and no action on the part of the Regional or State Board. Upon completion by the Regional Water Board, the TSD is forwarded to the USEPA, who then develops and adopts the TMDL based upon the information contained in the TSD. In addition, USEPA staff has also completed several TMDLs on their own, with consultation by Regional Water Board staff. The USEPA TMDL is often referred to as a “technical TMDL” because it does not include implementation or monitoring plans. Technical TMDLs have been developed for the following watersheds in this Region:

Noyo, Navarro, South Fork Eel, South Fork Trinity, Ten Mile, Van Duzen and Redwood Creek.

The Regional Water Board must amend its Basin Plan to include a summary of the technical TMDL (including all regulatory portions of the technical TMDL), as well as a TMDL implementation plan and monitoring plan for each USEPA and Regional Water Board developed technical TMDL. The following table lists waterbodies that are scheduled for technical TMDL completion between 2001 and 2004.

Table 1. Waterbodies Scheduled for TMDL Development Between 2001 and 2004

Waterbody	Listed Pollutants	TMDL Completion Date	Lead Agency
Trinity River (Upper)	Sediment	2001	USEPA
Trinity River (Middle)	Sediment	2001	USEPA
Trinity River (Lower)	Sediment	2001	USEPA
Albion River	Sediment	2001	USEPA
Gualala River	Sediment	2001	NCRWQCB ¹
Big River	Sediment	2001	USEPA
Eel River, North Fork	Sediment Temperature	2002	USEPA
Mattole River	Sediment Temperature	2002	NCRWQCB
Eel River, Middle Fork	Sediment Temperature	2003	USEPA
Eel River, Upper Main Fork	Sediment Temperature	2004	USEPA
Klamath River	Nutrients, DO Temperature	2004	NCRWQCB

¹North Coast Regional Water Quality Control Board

Staff recommends that this issue remain on the 2001 Triennial Review list.

ISSUE #10: REVIEW THE SEASONAL WASTE DISCHARGE PROHIBITIONS IN SECTION IV. IMPLEMENTATION PLANS

On March 24, 1994, the Regional Water Board adopted Resolution 94-49 which amended the waste discharge prohibitions for point source discharges to the Mad, Eel, and Russian Rivers. The amendment became effective on August 31, 1994, after approval by the State Water Board and the State Office of Administrative Law. The amendment only provided exception criteria for the discharge rate, not the discharge season (October 1 - May 14).

The City of Santa Rosa has requested modification of the Basin Plan to provide exception to the seasonal discharge prohibition for the purpose of managing wastewater storage facilities under unusual weather conditions.

In addition, a review of this section may be appropriate in order to further clarify the relationship between the point source prohibitions and the Basin Plan section that addresses stormwater discharges, which may also be defined as point sources.

Staff recommends that this issue remain on the 2001 Triennial Review list.

ISSUE #11: AMEND SECTION IV. IMPLEMENTATION PLANS TO RECOGNIZE CALIFORNIA'S SOURCE WATER ASSESSMENT PROGRAM

The 1986 Federal Safe Drinking Water Act (SDWA) established a well head protection program to protect groundwaters that supply wells and well fields serving as sources of supply for public water systems. Under the SDWA, each State was required to prepare a Well Head Protection Program and submit the plan to USEPA by June 19, 1989. Because the mandate did not include funding for the program, many states including California did not develop a well head protection program.

The 1996 Amendments to the SDWA established a related program for states called the Source Water Assessment Program (SWAP), which is being developed in California by the State Department of Health Services. States were required to submit a program to USEPA by March of 1999, after which the State will have two years to complete the assessment for all surface water and groundwater sources.

The Source Water Assessment Program includes assessment elements, protection elements, and specific procedures for delineating source protection areas for both ground and surface waters.

The City of Sebastopol was the first community in the State to establish a well head protection program under the SWAP. The Regional Water Board may need to amend the Basin Plan to recognize designated protection areas, and may be requested to implement controls to protect some designated areas.

Staff recommends that this issue remain on the 2001 Triennial Review list.

ISSUE #12: UPDATE SECTION IV. IMPLEMENTATION PLANS, NONPOINT SOURCE MEASURES WITH REGARD TO LOGGING, CONSTRUCTION, AND ASSOCIATED ACTIVITIES AND HERBICIDE WASTES FROM SILVICULTURAL APPLICATIONS

This portion of the Basin Plan, used in relation to logging activities, has not been amended since the Regional Water Board first adopted it in 1971. Several significant changes have occurred in this program since 1971:

1. The Timber Harvest Review Team was established under the California Environmental Quality Act in 1976.

2. In 1981, the State Water Board entered into a Management Agency Agreement (MAA) with the U.S. Department of Agriculture that established the USDA. Forest Service as the water quality management agency for federally owner timber lands under CWA Section 208.
3. In 1988, the State Water Board entered into a similar MAA with the Board of Forestry (BOF) and the California Department of Forestry and Fire Protection (CDF) recognizing the BOF and the CDF as water quality management agencies for non-federally owned timber land under CWA Section 208.
4. The *Guidelines for Implementation and Enforcement of Discharge Prohibitions Relating to Logging, Construction, or Associated Activities* is outdated with respect to the following:
 - a. Section B.2. of the *Guidelines* currently define “stream or watercourse” (for the purposes of applying the prohibitions only) as a “Natural watercourse as designated by a solid line or dash and three dots symbol shown in blue on the largest scale United States Geological Survey Topographic Map most recently published.” There are many streams not designated on a Topographic Map that support beneficial uses that are waters of the State and are protected by the policies of the Basin Plan. A suggested change would make all waters of the Region subject to the Prohibitions. This change would be consistent with the existing policy of implementation of water quality objectives to waters of the State.
 - b. The *Guidelines* do not accurately identify the applicability of other enforcement remedies available under the Porter-Cologne Water Quality Control Act (Porter-Cologne) aside from Waste Discharge Requirements, 13267 (b) letters, Cleanup and Abatement Orders, and Cease and Desist Orders described in the Basin Plan. These enforcement actions authorized under Porter-Cologne include time schedule orders, notice to comply orders, or administrative civil liabilities.
5. TMDLs adopted for a watershed are recognized as regulation under the Forest Practice Rules. If a TMDL has been developed for a watershed, CDF would require that it be included and implemented in any Timber Harvest Plan for that watershed.
6. The Regional Water Board should consider adding language to Section 4-30.00 to ensure unobstructed fish passage at stream crossings (migration beneficial use) for all salmonid life stages.

Staff recommends that this issue remain on the 2001 Triennial Review list. A Basin Plan amendment is necessary to update this section.

ISSUE #13: DEVELOP BASIN PLAN LANGUAGE REQUIRING WASTE DISCHARGES TO COMPLY WITH THE CALIFORNIA TOXIC RULE

The State Water Board adopted the Policy for Implementation of Toxics Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California (also known as the State Implementation Policy or SIP) on March 2, 2000. The SIP (effective as of May 22, 2000) was created following the rescission of the Inland Surface Waters Plan and Enclosed Bays and Estuaries Plan in 1994. The SIP was developed in response to federal regulations that require each state to develop standards for toxic pollutants. Specifically, the Policy implements provisions promulgated by the USEPA in the California Toxics Rule (CTR), which established criteria for 126 priority pollutants.

The SIP applies to discharges of toxic pollutants into the inland surface waters, enclosed bays, and estuaries of California subject to regulation under the state's Porter-Cologne (Division 7 of the California Water Code) and the federal CWA. The SIP establishes: (1) implementation provisions for priority pollutant criteria promulgated by the USEPA through the National Toxics Rule (NTR) and through the California Toxics Rule (CTR), and for priority pollutant objectives established by Regional Water Boards in their basin plans; (2) monitoring requirements for polychlorodibenzodioxins and polychlorodibenzofurans; and (3) chronic toxicity control provisions.

For many dischargers, insufficient background and effluent data exist to determine whether any of the priority pollutants are, or may be, discharged at a level that will cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard. In accordance with the SIP, the Regional Water Board Executive Officer has issued 13267 (b) Orders to require dischargers to obtain these data. After the data is gathered, the reasonable potential analysis (RPA) is performed to assess the reasonable potential to cause or contribute to an excursion above any applicable priority pollutant criterion or objective. If the potential is present, then the permit is reopened to include additional numerical limitations, as necessary.

Instead of developing language as recommended during the 1998 Triennial Review, staff recommends including the entire document (SIP) as an appendix to the Basin Plan. For greater efficiency, this issue should be addressed simultaneously with issues #14 and #17 as they are closely linked.

ISSUE #14: CONSIDER REVISION TO THE WATER QUALITY OBJECTIVE FOR TOXICITY

The narrative water quality objective for toxicity in Section III of the Basin Plan has remained unchanged since 1974. Regional Water Board staff must translate this narrative water quality standard into numerical effluent limitations in National Pollutant Discharge Elimination Systems (NPDES) permits where there is a reasonable potential for the discharge to cause or contribute to an exceedance of the standard. The existing Basin Plan language could be clarified to facilitate this translation.

Staff recommends including this issue in the 2001 Triennial Review. For greater efficiency, this issue should be addressed simultaneously with issues #13 and #17 as they are linked.

ISSUE #15: COMPLIANCE SCHEDULE ISSUES

Whenever water quality standards are revised, compliance schedules may be included in permits to allow dischargers a reasonable length of time to bring their discharge into compliance. This applies only in cases where either the basin plan or a state policy (e.g., the SIP) authorizes a compliance schedule.

Staff recommends removing this issue from 2001 Triennial Review list and consider reviewing the issue during the 2004 Triennial Review.

ISSUE #16: REVIEW CHEMICAL OBJECTIVES IN SECTION 3. WATER QUALITY OBJECTIVES

In reviewing the City of Santa Rosa's comments in 1998, Regional Water Board staff recognized that the Title 22 limitations specified in the Basin Plan are outdated. In 1998, staff recommended that this section of the Basin Plan be revised to include a general reference to the tables in Title 22 that contain chemical objectives and to remove the specific objectives from the Basin Plan.

Title 22 was recently updated and staff is currently reviewing the efficacy of this request. Therefore, staff recommends including this issue in the 2001 Triennial Review.

ISSUE #17: DEVELOP A POLICY REGARDING WATER QUALITY-BASED EFFLUENT LIMITATIONS AND MIXING ZONES

The Clean Water Act allows mixing zones at the discretion of the State, and USEPA requires that States have a definitive statement in their standards on whether or not mixing zones are allowed. This Regional Water Board has not allowed the use of mixing zones for dilution of wastewater discharges. Mixing zones were considered by the State Water Board when the Sources of Drinking Water policy was adopted, and no such zones were included in that policy which was adopted to address requirements of Proposition 65.

The Regional Water Board's policy in regard to mixing zones for toxicity is included in the Basin Plan in the Toxicity segment of Section 3, Water Quality Objectives. This segment states "All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in human, plant, animal, or aquatic life." and "The survival of aquatic life in surface waters subjected to a waste discharge, or other controllable water quality factors, shall not be less than that for the same water body in areas unaffected by the waste discharge ..."

Staff recommends including this issue on the 2001 Triennial Review. This issue requires review in light of the California Toxics Rule to ensure that the issue is addressed consistently. Whether the issue results in a proposed Basin Plan amendment or some other action is not predictable at this time. For greater efficiency, this issue should be addressed simultaneously with issues #13 and #14 as they are linked.

B. IDENTIFICATION OF NEW WATER QUALITY ISSUES FOR CONSIDERATION ON THE 2001 PRIORITY LIST

In addition to those continuing issues identified in Section V.A. of this report, Regional Water Board staff has identified additional water quality issues that may be addressed by Basin Plan updates. Issues #19-22, listed below, are funded through a contract with Sonoma County Water Agency (SCWA) consequently, they will not be included in any priority listing. Other issues do not currently have an identified funding source, and will be prioritized.

ISSUE #18: DEVELOP REGIONWIDE ACTION PLAN FOR CONTROL OF SEDIMENT DISCHARGES

A majority of the North Coast Region's watersheds are listed on California Clean Water Act Section 303(d) list (since 1992) as water quality limited due to sedimentation. The level of sedimentation exceeds the existing narrative water quality objectives established to protect beneficial uses, particularly the cold water fishery. Elevated rates of erosion from land use practices and other causes are impacting the migration, spawning, reproduction, and early development of cold water anadromous fish. The primary water quality issues are recovery of threatened and endangered species such as coho and chinook salmon and steelhead trout. The beneficial uses of water on the North Coast Region have been negatively impacted by sedimentation throughout the Region. Both historic and modern land use practices have contributed to elevated rates of erosion and impacts to beneficial uses.

Regional Water Board staff has been researching ways to address sedimentation problems across the North Coast Region and has identified the need for a Regionwide approach to reducing the sedimentation occurring from a variety of land uses.

Staff is also aware of a need for an action plan or policy for riparian zone management as well as for unstable areas, both of which could be addressed concurrently. Staff will be looking into this over the next three to five years as additional scientific information is developed related to TMDLs for temperature and other studies.

Staff recommends the development of a Regionwide Action Plan for Control of Sediment that will augment the existing prohibitions for controllable sources of sediment from logging, construction, and related activities across the entire North Coast Region. Staff is currently reviewing the details of this project.

Staff recommends including this issue on the 2001 Triennial Review List.

ISSUE #19: UPDATE DISSOLVED OXYGEN (DO) OBJECTIVE FOR THE RUSSIAN RIVER

Current Russian River DO water quality objectives appear adequate in protecting all salmonid life cycle stages except embryo and larval stages. Regional Water Board staff is preparing a Basin Plan amendment to address this issue based on review of the literature and other regions' and states' DO objectives. The amendment would be fully protective of all salmonid species lifestages with regard to DO.

In addition to updated water quality objectives, the Basin Plan amendment will also include an implementation plan and a monitoring plan. The resulting information will assist us in developing objectives for other waterbodies in the future.

This issue is funded under the Sonoma County Water Agency contract. A Basin Plan amendment is planned for development during 2001-2002.

ISSUE #20: UPDATE THE TEMPERATURE OBJECTIVE FOR THE RUSSIAN RIVER

The temperature objective in the Basin Plan should be improved to provide increased protection to salmonid species. Regional Water Board staff is preparing a Basin Plan amendment to update the existing temperature objective as well as a strategy to apply the proposed objective (an implementation plan and a monitoring plan).

The resulting information will assist Regional Water Board staff in developing objectives for other waterbodies in the future.

This issue is funded under the Sonoma County Water Agency contract. A Basin Plan amendment is planned for development during 2001-2002.

ISSUE #21: UPDATE SEDIMENT OBJECTIVE FOR THE RUSSIAN RIVER

Regional Water Board staff has found that the current Basin Plan objectives for sediment are probably not specific enough to protect threatened or endangered salmonid species.

Staff is in the process of developing a Basin Plan amendment that will add instream targets for the Russian River watershed.

Numeric targets will be proposed that are intended to interpret and apply the narrative water quality objectives. A variety of instream indicators will be proposed because no single indicator provides a truly effective, discriminating measure of the relationship between sediment loading and instream sediment impacts.

In addition to updated water quality objectives, any Basin Plan amendment will also include an implementation plan and a monitoring plan. The resulting information will assist Regional Water Board staff in developing objectives for other waterbodies in the future.

This issue is funded under the Sonoma County Water Agency contract. A Basin Plan amendment is planned for development during 2001-2002.

ISSUE #22: UPDATE ALUMINUM OBJECTIVE FOR THE RUSSIAN RIVER

The aluminum objective found in the Basin Plan does not appear protective of salmonid species. Regional Water Board staff will recommend the adoption of USEPA criteria.

In addition to updated water quality objectives, the Basin Plan amendment will also include an implementation plan and a monitoring plan. The resulting information will assist us in developing objective for other waterbodies in the future.

This issue is a funded under the Sonoma County Water Agency contract. A Basin Plan amendment is planned for development during 2001-2002.

ISSUE #23: REVIEW THE WATER QUALITY PROBLEMS RESULTING FROM GRAVEL MINING

Regional Water Board staff routinely review plans for mining gravel and rock, and provides comments to the local planning agencies as part of the environmental review process. This process occurs prior to the issuance of a Use Permit and approval of a reclamation plan as required by the State Mined Area Reclamation Act. The Regional Water Board may issue Waste Discharge Requirements (WDRs); stormwater permits, or waive the issuance of WDRs to regulate individual gravel operations.

Permits have addressed the primary impacts but not the secondary geomorphologic impacts of gravel mining such as streambank erosion and streambed degradation. However, we expect to begin addressing these secondary impacts in upcoming WDR revisions. Other potential impacts to beneficial uses include fisheries habitat impairment and degradation of drinking water supplies. Gravel mining projects may be reviewed by the National Marine Fisheries Service (NMFS) through the Section 7 consultation process due to the Endangered Species Act listing of coho and chinook salmon and steelhead trout in the North Coast Region.

Staff recommends adding this issue to the 2001 Triennial Review as discussion of this issue is warranted. A Basin Plan amendment may or may not result.

ISSUE #24: TRINITY RIVER TEMPERATURE OBJECTIVES

The Trinity River is a shared resource between the Hoopa Valley Tribe and the North Coast Regional Water Board. The tribe is expected to submit their Water Quality Control Plan for final USEPA approval in the year 2001. This document includes temperature objectives for the Trinity River on the Hoopa Reservation, which are consistent with the *Flow Evaluation Study* conducted by the Fish and Wildlife Service, the Hoopa Valley Tribe and other agencies. Presently, the Basin Plan contains temperature objectives for the Trinity River between Lewiston Dam and Douglas City and between Lewiston Dam and the North Fork Trinity River. USEPA has requested that the Basin Plan be revised to include temperature objectives that are, at a minimum, consistent with the *Flow Evaluation Study*. Temperature will be addressed in the South Fork Trinity River as part of the TMDL to be completed by USEPA in 2008. Staff will be working with the Hoopa Valley Tribe and USEPA to develop a coordinated set of temperature objectives that are protective of beneficial uses.

Staff recommends adding this issue to the 2001 Triennial Review and reviewing the *Flow Evaluation Study* and other relevant documents for any needed changes to the Basin Plan.

ISSUE #25: EXPAND ANTIDEGRADATION POLICY IMPLEMENTATION DISCUSSION

USEPA has requested that the discussion of implementation of the State's antidegradation policy should be expanded to clarify that the State Water Board has, in Order 86-17, interpreted Resolution 68-16 to be consistent with the federal Antidegradation Policy. An October 7, 1987 guidance memorandum from the State Water Board provides procedures for implementing the Antidegradation Policy. This discussion also should be expanded to fully address how the Antidegradation Policy will be applied to non-point sources, as requested by environmental organizations in the region.

Further review is needed to determine if additional clarification in the Basin Plan is necessary. Therefore, staff recommends adding this issue to the 2001 Triennial Review list.

ISSUE #26: UPDATE BACTERIA OBJECTIVES

The Basin Plan water quality standards include only total and fecal coliform bacteria as indicators. In 1986, USEPA published its 304(a) water quality criteria for bacteria, which recommends the use of *Escherichia coli* (*E. coli*) and Enterococci rather than fecal coliforms for the protection of primary contact recreation. The epidemiological data upon which the national criteria are based suggest that these bacterial indicators are better correlated to water contact-exposure related health effects. In addition, USEPA's Action Plan for Beaches and Recreational Waters (EPA/600/R-98/079, March 1999) calls for all states to adopt bacterial standards that are consistent with USEPA guidance by 2003. Regional Water Boards can continue to use total and fecal coliform in addition to *Escherichia coli* and Enterococci; however, USEPA requests that the Basin Plan be revised to include these criteria.

Staff recommends adding this issue to the 2001 Triennial Review list and updating these criteria when resources to do so are available.

ISSUE #27: ADD WATER QUALITY OBJECTIVES FOR AMMONIA AND TOTAL RESIDUAL CHLORINE

An announcement in the Federal Register of the availability of USEPA's latest revised national criteria guidance for ammonia was published on December 22, 1999, with a time-frame for expected state adoption of numeric criteria that will be applicable to all state waters. As noted in the announcement, USEPA will likely promulgate criteria for any state that does not adopt such criteria into its water quality standards, in order to ensure that ammonia criteria are in effect in all states by 2004. USEPA's water quality criteria guidance for chlorine is titled Ambient Water Quality Criteria for Chlorine 1984 (USEPA 440/5-84-030), and was published in January 1985. The Basin Plan should be revised to include objectives for these pollutants.

Staff recommends adding this issue to the 2001 Triennial Review list and updating these criteria when resources to do so are available.

ISSUE #28: UPDATE pH OBJECTIVE

The pH objective for the Eel River is 6.5 to 8.5, consistent with the overall pH objective for all regional waters. Some Eel River municipal dischargers have raised issues regarding attainability of this limit.

Staff recommends adding this issue to the 2001 Triennial Review for further discussion.

ISSUE #29: WORK WITH FISH FRIENDLY FARMING AND SIMILAR PROGRAMS TO EXPLORE ADDING APPLICABLE ACTION PLANS INTO THE BASIN PLAN.

Fish Friendly Farming is a certification program that will provide an incentive-based framework for the farmer to gain an economic benefit from the sale and marketing of “Eco-friendly or green” products, such as wine, while being protective of water quality and the environment. Staff has been working with local agencies and organizations on this issue.

Staff recommends adding this issue to the 2001 Triennial Review for further consideration.

ISSUE #30: CONSIDER UPDATING THE POLICY ON PESTICIDE APPLICATION

The Basin Plan currently contains an Action Plan for control of discharges of herbicide wastes from silvicultural applications. Staff is aware of the possible need to update the Action Plan to expand its applicability and to address changes in legislation and applicable water quality objectives. Staff will be reporting on the specific areas that may need updating.

Staff recommends adding this issue to the 2001 Triennial Review list and updating these criteria if deemed necessary when resources to do so are available.

ISSUE #31: REVIEW BASIN PLAN FOR CONSISTENCY WITH STATEWIDE PLANS (i.e. ENCLOSED BAYS AND ESTUARIES, INLAND SURFACE WATERS)- ESPECIALLY IN REGARD TO TOXICITY

One example of this is that The Ocean Plan has been revised and will be finalized soon. One significant change is language in the Ocean Plan regarding discharges to Areas of Special Biological Significance (ASBS). It basically prohibits all discharges (point and non-point) to these areas. The Basin Plan references the ASBS on the first page of the Implementation Section.

Staff recommends adding this issue to the 2001 Triennial Review.

ISSUE #32: UPDATE THE WATER QUALITY OBJECTIVES FOR GROUNDWATER TO INCLUDE ALL OBJECTIVES APPLICABLE TO IDENTIFIED GROUNDWATER BENEFICIAL USES: MUN, AGR AND IND.

The Basin Plan currently contains four general water quality objectives for Groundwaters: Taste and Odors, Bacteria, Radioactivity, and Chemical Constituents. The objective for Toxicity does not appear under the groundwater heading. The toxicity objective for surface waters states:

"Toxicity

Ground waters shall be maintained free of toxic substances in concentrations that produce detrimental physiological responses in human, plant, animal, or aquatic life associated with designated beneficial use(s). This objective applies regardless of whether the toxicity is caused by a single substance or the interactive effect of multiple substances."

This objective is as applicable to groundwater (which may be used for irrigation or aquaculture) as to surface waters, and should be included in the list of objectives in the Basin Plan under the groundwater section.

Staff recommends adding this issue to the 2001 Triennial Review.

For greater efficiency, this issue should be addressed simultaneously with issues #13 and #14 as they are linked.

ISSUE #33: REVIEW POLICY FOR WAIVERS OF WDRs FOR SPECIFIC TYPES OF DISCHARGES (BASIN PLAN APPENDIX II)

SB 390 was passed in 2000, and addressed the need for adequate reviews of waivers of waste discharge requirements. The legislation includes the following:

- Sunsets all existing waivers by 2003
- Waiver policy terms must be reviewed at a public hearing
- Requires Regional Water Boards to inspect all waivers

Waiver of waste discharge requirements for some discharges remains essential, therefore a revised policy (Basin Plan amendment) is required. However, staff judges that many historical waivers will be replaced by general waste discharge requirements in the future.

Staff recommends including this issue in the 2001 Triennial Review and revising the Waiver Policy by the 2003 deadline.

ISSUE #34: ADD BIOCRITERIA OBJECTIVES

Development of biocriteria is identified in USEPA's *Water Quality Criteria and Standards Plan* (May 1998), as one of six priority objectives for the water quality standards program over the next decade. USEPA Region IX's Biocriteria Plan, consistent with these priorities, seeks to work with states through grants and technical assistance to ensure progress to realize the full potential of bioassessments and biocriteria for managing water quality and protecting aquatic life in all water bodies.

Staff recommends adding this issue to the 2001 Triennial Review list and commencing a review of available biocriteria to determine applicability for inclusion in the Basin Plan.

ISSUE #35: EDITORIAL REVISIONS AND MINOR CLARIFICATIONS OR CORRECTIONS TO TEXT AND REFERENCE TO NEW LAWS, PLANS AND REGULATIONS

Regional Water Board Staff has identified several editorial revisions and minor clarifications or corrections to Basin Plan text. In addition, references to new laws, plans and regulations may be necessary.

One such revision should be the addition of the word “**of**” in the title of State Water Board Resolution No. 68-16, “Statement of Policy with Respect to Maintaining High Quality of Waters in California” (page 4-2.00 of the Basin Plan & perhaps elsewhere in the Plan).

Staff recommends adding this issue to the 2001 Triennial Review list and researching areas of the Basin Plan that may require minor updating.

ISSUE #36: IN-STREAM FLOWS

Maintenance of beneficial uses through maintaining adequate in-stream flows has been raised as a concern in TMDL stakeholder meetings and various other forums. There is need for improved coordination between the Regional Water Boards and the Division of Water Rights.

Staff is aware of a need for further review and discussion on this issue. Therefore, inclusion of this issue on the 2001 Triennial Review list is recommended.

Attachment 1

**California Regional Water Quality Control Board
North Coast Region**

Resolution No. 98-113

ADOPTING A PRIORITY LIST OF WATER QUALITY ISSUES IN
IN FULFILLMENT OF THE TRIENNIAL REVIEW OF ITS
WATER QUALITY CONTROL PLAN FOR THE NORTH COAST REGION

- WHEREAS, The California Regional Water Quality Control Board, North Coast Region (Regional Water Board), adopted the Water Quality Control Plans (Basin Plans) for the Klamath River Basin (1A) and the North Coastal Basin (1B) and their abstracts on March 20, 1975. The abstracts of the Klamath River Basin Plan (1A) and the North Coastal Basin Plan (1B) were combined to form *the Water Quality Control Plan for the North Coast Region* (Basin Plan) on April 28, 1988, and the Regional Water Board updated and amended the Basin Plan on December 9, 1993. In 1994 the State Water Resources Control Board (State Water Board) and the Office of Administrative Law approved the updates and amendments to the Basin Plan. The Basin Plan includes water quality objectives, implementation plans for point and nonpoint source discharges, and statewide plans and policies; and
- WHEREAS, the Regional Water Board is responsible for reviewing water quality standards and implementation plans and as appropriate, modifying and adoption of standards under provisions set forth in Sections 303(c), (d), and (e) of the Federal Clean Water Act and in Section 13240, Division 7 of the California Code of Regulations; and
- WHEREAS, the Regional Water Board conducted public hearings on July 23, 1998, August 27, 1998, and October 22, 1998 for the purpose of soliciting advice regarding the review and revision of water quality issues appropriately contained in the Basin Plan, and has reviewed and carefully considered all comments and testimony received; and
- WHEREAS, the Regional Water Board has prepared a Priority List of Water Quality Planning Issues that will appropriately update its Basin Plan; and
- WHEREAS, the Regional Water Board has reviewed its water quality standards and implementation plans and finds them appropriate with the exception of those issues identified on the attached Priority List (Table 1).

THEREFORE, BE IT RESOLVED that the Regional Water Board, in fulfillment of the requirements described in Sections 303(c), (d), and (e), of the Clean Water Act, and in Section 13240, Division 7 of the California Code of Regulations, hereby approves the Priority List of Water Quality Planning Issues which is incorporated herein and described in Table 1 of this Resolution.

ALSO, THEREFORE BE IT RESOLVED that the Basin Plan as it currently exists remain effective until such time as it is changed by formal Board action.

Certification

I, Lee Michlin, Executive Officer, do hereby certify that the foregoing is a full, true, and correct copy of a Resolution adopted by the California Regional Water Quality Control Board, North Coast Region, on October 22, 1998.

Original signed by Executive Officer

1998 – 2001 Priority List

Table 1. Priority List of Water Quality Planning Issues Identified During the Triennial Review of the *Water Quality Control Plan for the North Coast Region*, and Estimated Schedule of Work.

Issue	Priority	Fiscal Year	Estimated Staff Effort (Staff Years) ¹
Amend Section 4. Implementation Plans to Include TMDL Implementation Strategies for 303(d) Listed Waterbodies ²	1	1998/1999	1.5
Develop a Fuels Policy for the Regulation of Underground Storage Tanks Specific to the North Coast Region	1	1998/1999	1.5
Review the Seasonal Waste Discharge Prohibitions in Section IV. Implementation Plans	1	1998/1999 1999/2000	0.50 1.5
Amend Table 2-1, Beneficial Uses	1	1998/1999	0.50
Consider Revision to the Water Quality Objective for Toxicity	1	1999/2000	0.50
Compliance Schedule Issues ³	1	1998/1999	---
Review Chemical Objectives in Section 3. Water Quality Objectives ³	1	1998/1999	---
Update Section 4. Implementation Plans, Nonpoint Source Measures with Regard to Logging, Construction, and Associated Activities and Herbicide Wastes From Silvicultural Applications	1	1999/2000	0.50
Consider Revisions to the Water Quality Objectives for Dissolved Oxygen and Temperature	2	1999/2000 2000/2001	0.40 0.60
Review Water Quality Problems in the Klamath, Scott, and Shasta Rivers	2	1998/1999 1999/2000 2000/2001	0.10 0.10 0.10
Update the Policy on the Disposal of Solid Wastes	2	1999/2000	0.50
Amend Section 4. Implementation Plans to Recognize California's Source Water Assessment Program	2	2000/2001	0.50
Amend Section 4. Implementation Plans, Nonpoint source Measures (to include additional nonpoint source control measures)	2	2000/2001	0.50
Consider Specific Objectives for Nutrients	2	2000/2001	1.0
Consider Including a Policy Regarding Water Quality-Based Effluent Limitations and Mixing Zones	2	2000/2001	0.50
Amend Section 4. Implementation Plans to Include TMDL Implementation Strategies for 303(d) Listed Waterbodies ⁵	3	Not Estimated	12

Fiscal Year	Est. Staff Resources	Estimated Staff Effort
1998/1999	3.0 staff years (SYs)	4.1
1999/2000	2.5 staff years	3.5
2000/2001	2.5 staff years	3.2

(Est. Staff Resources = 2.2 SYs of planning resources each year plus augmentation from NPS resources)

¹ Estimated Staff Effort is the amount of time (in staff years) we anticipate expending on each issue.

² TMDLs will be completed for the Garcia River and Redwood Creek. The TMDL for the Laguna de Santa Rosa will be reviewed and revised.

³ Combine this Basin Plan revision with the revision of the water quality objective for toxicity

⁴ Consent decree waterbodies not listed in Footnote 3 of this Table.

**NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD
TRIENNIAL REVIEW SCHEDULE 2001**

March 22	Introduce Triennial Review at Board Meeting (informational item)
May 4	Triennial Review Public Notice Mailing
May 4	First Triennial Review Public Report Available
June 5	Public workshop in Eureka
June 6	Public workshop in Yreka
June 12	Public workshop in Santa Rosa
July 23	Second Triennial Review Public Report Available
August 23	Triennial Review Public Hearing (priority list adoption) in Santa Rosa